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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

MARIA TSATAS, an individual; LEONIDAS VALKANAS, as trustee of the KEET TRUST dated August 1, 2015; RAYMOND BARAZ, an individual; PASCAL ABDALLAH, an individual; JIMMY TSOUTSOURAS, an individual; FOTINI VENETIS, an individual; NICHOLAS TSOUTSOURAS, an individual; CONNIE TSOUTSOURAS, an individual; RAYMONDE KANHA, an individual; ALFRED BEKHIT, an individual; JACQUEZ ELBAZ, an individual; MARTINE BENEZRA, an individual; JAMES P. CARROLL, an individual; DAVID CHIN, an individual; JENNIFER MILLS, an individual; PAUL SUBLETT, an individual; ANDREW SUBLETT, an individual; MANOLIS KOSTAKIS, an individual; ESTHER GEORGAKOPOULOS, an individual; EVAGELIA KOSTAKIS, an individual; DENIS PARSONS, an individual; SOFIA KARDARAS, an individual; JIMMY ASMAKLIS, an individual; CORRADINO

CASE NO.: 2:20-cv-2045-RFB-BNW

**STIPULATED REQUEST FOR  
EXTENSION OF DISPOSITIVE MOTION  
DEADLINE AND DEADLINE TO FILE  
JOINT PRETRIAL ORDER BY 7 DAYS**

**(Thirteenth Request)**

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GALUPPO, an individual; DENIS KOPITAS, an individual; TERRY TSATAS, an individual; GEORGE TSATAS, an individual; PANAGIOTA TSATAS, an individual; OURANIA TSATAS, an individual; KIRIAKOS PRIMBAS, an individual; EVANTHIA PRIMBAS, an individual; PATRICK AYOUB, an individual; MICHAEL BESCEC, an individual; ERNEST LEBOEUF, an individual; PHILIPPE LEGAULT, an individual; EFTIHIOS LITSAKIS, an individual; GIOVANNI MONCADA, an individual; MARC RIEL, an individual; JARADEH SALIM, an individual; HANI HAMAM, an individual; CONSTANTIN ZISSIS, an individual; BESSIE PEPPAS, an individual; NIKI PALIOVRAKAS, an individual,

Plaintiffs,

v.

AIRBORNE WIRELESS NETWORK, INC., a Nevada Corporation; MICHAEL J. WARREN, an individual; J. EDWARD DANIELS, an individual; MARIUS DE MOS, an individual; JASON DE MOS, an individual; ROBERT BRUCE HARRIS, an individual; KELLY KABILAFKAS, an individual; and APCENTIVE, INC., a Nevada Corporation,

Defendants.

**STIPULATED REQUEST FOR EXTENSION OF DEADLINES FOR DISPOSITIVE**  
**MOTIONS**

Plaintiffs (as listed in the above caption, with the exception of the ten named plaintiffs for whom the Court granted a Motion to Withdraw (ECF No. 219) and for which there is a pending unopposed request to dismiss them (ECF No. 236)) and Defendants (as listed in the above caption, with the exception of the deceased defendant Marius de Mos) (together, the “Parties”), by and through their undersigned counsel of record, submit this Stipulated Request for Extension of Dispositive Motion Deadline and Deadline to File Joint Pretrial Order by 7 days, pursuant to FRCP 6(b) and 16(b), as well as LR 26-3 and LR IA 6-1.

WHEREAS, this is the Parties’ thirteenth request for an extension of deadlines in the scheduling order.

WHEREAS, on April 3, 2024, the Court granted the parties’ most recent stipulated request for an extension of the scheduling order (ECF No. 253), such that the following cutoff dates and briefing schedule currently applies:

Dispositive Motions – May 15, 2024

Responses to Dispositive Motions due – June 19, 2024

Replies to Dispositive Motions due – July 10, 2024

Proposed Joint Pretrial Order – August 9, 2024, or 30 days after the final dispositive motion is ruled upon.

WHEREAS, pursuant to LR 26-3, the Parties do not dispute that both sides have acted diligently since the last request for an extension, that good cause supports an extension of 7 days because Plaintiffs’ counsel needs additional time to ensure the timely receipt of supporting declarations from all 33 remaining plaintiffs and that any material that needs to be submitted under seal is appropriately handled, and that Defendants do not object to Plaintiffs’ counsel’s need for additional time in this regard,

THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their respective attorneys of record, that the below-listed proposed schedule should govern this case, without prejudice to requests for further extensions for good cause:

Dispositive Motions – May 22, 2024

Responses to Dispositive Motions due – June 26, 2024

Replies to Dispositive Motions due – July 17, 2024

Proposed Joint Pretrial Order – August 16, 2024, or 30 days after the final  
dispositive motion is ruled upon.

**IT IS SO STIPULATED.**

DATED: May 9, 2024

Respectfully submitted.

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NOVIAN & NOVIAN, LLP

By: /s/ Andrew B. Goodman

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DATED: May 9, 2024

Respectfully submitted.

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LAW OFFICES OF S. DON BENNION

By: /s/ Peter L. Chasey

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2 6980 O'Bannon Drive, Suite 400  
3 Las Vegas, Nevada 89117

4 *Attorneys for Defendants*

5 IT IS SO ORDERED:

6   
7 \_\_\_\_\_  
8 UNITED STATES MAGISTRATE JUDGE

9 DATED: 5/14/2024  
10 \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I, Amanda McGill, declare that I am employed by the law firm of Novian & Novian, LLP, a citizen of the United States of America, a resident of the state of California, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On May 9, 2024, I caused a true and correct copy of the foregoing document to be served on the person(s) listed below in the manner indicated:

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DATED May 9, 2024.

/s/ Amanda McGill

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